

WENDY L. WATANABE AUDITOR-CONTROLLER

> MARIA M. OMS CHIEF DEPUTY

May 4, 2010

COUNTY OF LOS ANGELES DEPARTMENT OF AUDITOR-CONTROLLER

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ASST. AUDITOR-CONTROLLERS

ROBERT A. DAVIS JOHN NAIMO JUDI E. THOMAS

TO:

Supervisor Gloria Molina, Chair

Supervisor Mark Ridley-Thomas Supervisor Zev Yaroslavsky

Supervisor Don Knabe

Supervisor Michael D. Antonovich

FROM:

Wendy L. Watanabe

Auditor-Controller

SUBJECT:

ST. JOSEPH CENTER CONTRACT COMPLIANCE REVIEW - A

DEPARTMENT OF MENTAL HEALTH SERVICE PROVIDER

We completed a program review of St. Joseph Center (Agency), a Department of Mental Health (DMH) service provider.

Background

DMH contracts with St. Joseph Center, a private non-profit community-based organization that provides services to clients in Service Planning Area 3. Services include interviewing program clients, assessing their mental health needs and developing and implementing a treatment plan. The Agency's headquarters is located in the Third District.

DMH paid St. Joseph Center on a cost-reimbursement basis between \$2.02 and \$4.81 per minute of staff time (\$121.20 to \$288.60 per hour) for services or approximately \$850,000 for Fiscal Year 2008-09.

Purpose/Methodology

The purpose of our review was to determine the appropriateness of the services St. Joseph Center provided based on available documentation in accordance with the County contract. This included a review of the Agency's billings, participant charts and personnel records. We also interviewed a number of the Agency's staff.

Results of Review

St. Joseph Center staff assigned to the County contract possessed the required qualifications. However, St. Joseph Center over-billed DMH \$1,245 and did not comply with other County contract requirements. Specifically, St. Joseph Center:

- Billed DMH \$1,245 for 525 (17%) of the 3,133 service minutes sampled without adequate documentation to support the billings.
- Did not complete some elements of the Assessments and Client Care Plans in accordance with the County contract. For example, all 15 Client Care Plans sampled did not contain specific or observable objectives or address the clients' needs identified in their Assessments as required by the County contract.

We have attached the details of our review along with recommendations for corrective action.

Review of Report

We discussed the results of our review with St. Joseph Center and DMH. In the attached response, the Agency concurred with our recommendations and agreed to repay DMH \$1,245.

We thank St. Joseph Center management for their cooperation and assistance during this review. Please call me if you have any questions or your staff may contact Don Chadwick at (213) 253-0301.

WLW:MMO:JET:DC:EB

Attachment

c: William T Fujioka, Chief Executive Officer
Dr. Marvin J. Southard, Director, Department of Mental Health
Kevin McCardle, Chair, Board of Directors, St. Joseph Center
Dr. Va Lecia Adams, Executive Director, St. Joseph Center
Public Information Office
Audit Committee

DEPARTMENT OF MENTAL HEALTH ST. JOSEPH CENTER FISCAL YEAR 2008-09

BILLED SERVICES

Objective

Determine whether St. Joseph Center (Agency) provided the services billed in accordance with their County contract with the Department of Mental Health (DMH).

Verification

We selected 30 billings totaling 3,133 minutes from 26,830 service minutes of approved Medi-Cal billings for May and June 2009, which were the most current billings available at the time of our review (November 2009). We reviewed the Assessments, Client Care Plans and Progress Notes maintained in the clients' charts for the selected billings. The 3,133 minutes represent services provided to 15 program participants.

Results

St. Joseph Center billed DMH \$1,245 for 525 (17%) of the 3,133 service minutes sampled without adequate documentation to support the billings. Specifically, St. Joseph Center billed DMH:

- For 105 service minutes totaling \$212 for the Targeted Case Management without describing linkage, consultation or placement.
- For 420 service minutes totaling \$1,033 for Mental Health Services without documenting the staff's specific contribution or intervention.

In addition, the Agency did not always complete some elements of the Assessments and Client Care Plans in accordance with the County contract requirements.

Assessments

St. Joseph Center did not adequately describe the clients' symptoms and behaviors consistent with the Diagnostic and Statistical Manual of Mental Disorder (DSM) to support the given diagnosis for eight (53%) of the 15 clients sampled on their Assessments. An Assessment is a diagnostic tool used to document the clinical evaluation of each client and establish the client's mental health treatment needs. The County contract requires Agencies to follow the DSM when diagnosing clients.

Client Care Plans

All of the 15 Client Care Plans sampled did not contain specific or observable objectives or address the clients' needs identified in their Assessments as required by the County contract.

Recommendations

St. Joseph Center management:

- 1. Repay DMH \$1,245.
- 2. Maintain sufficient documentation to support the service minutes billed to DMH.
- 3. Ensure that Assessments and Client Care Plans are completed in accordance with the County contract.

STAFFING LEVELS

Objective

Determine whether the Agency maintained the appropriate staffing ratios for applicable services.

We did not perform test work in this section, as the Agency did not provide services that require staffing ratios for this particular program.

Recommendation

None.

STAFFING QUALIFICATIONS

Objective

Determine whether St. Joseph Center's treatment staff possessed the required qualifications to provide the services.

Verification

We reviewed the California Board of Behavioral Sciences' website and/or the personnel files for eight of the 12 St. Joseph Center's treatment staff who provided services to DMH clients during May and June 2009.

Results

Each employee in our sample possessed the qualifications required to provide the services billed.

Recommendation

None.

PRIOR YEAR FOLLOW-UP

Objective

Determine the status of the recommendations reported in the prior monitoring review completed by the Auditor-Controller.

Verification

We verified whether the outstanding recommendation from Fiscal Year 2006-07 monitoring review was implemented. The report was issued on May 23, 2007.

Results

St. Joseph Center implemented the recommendation contained in our prior monitoring report.

Recommendation

None.



RECEIVED

March 19, 2010

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Wendy L. Watanabe County of Los Angeles

AUDI. SHTROLLER

Department of Auditor-Controller Kenneth Hahn Hall of Administration 500 West Temple Street, Room 525 Los Angeles, CA 90012-3873

RE: St. Joseph Center Program Review

Dear Ms. Watanabe:

Management staff of St. Joseph Center, Provider # 7114 has reviewed the report draft of the Auditor-Controller dated March, 2010.

This letter serves as documentation of the Corrective Action Plan in response to the area needing correction below, "Billed Services".

Auditor's finding: "\$212 for 105 service minutes billed for the Targeted Case Management without describing linkage, consultation or placement; \$1,033 for 420 service minutes billed for Mental Health Services without documenting the staff's specific contribution or intervention".

Corrective Action Plan: (1) St. Joseph Center will repay the Department of Mental Health \$1245.00; (2) St. Joseph Center staff will maintain sufficient documentation to support the service minutes billed to DMH; (3) All St. Joseph Center staff billing on this contract will attend a documentation training for paraprofessionals provided by the Department of Mental Health (DMH), which DMH has stated will be available sometime in of April, 2010.

Auditor's finding: "St. Joseph Center did not adequately describe the client's symptoms and behaviors consistent with the Diagnostic and Statistical Manual of Mental Disorder to support the given diagnosis for eight of the 15 clients sampled on their Assessments"; "None of the 15 client care plans contained specific or observable objectives or addressed the clients' needs identified in their Assessments as required by the County contract.

Corrective Action Plan: St. Joseph Center intake staff will increase focus during the assessment period to provide improved and detailed documentation around symptoms and behaviors consistent with diagnoses and impairment, in all areas but especially in the area of financial management, helping to ensure medical necessity is detailed. When creating client care plans (CCP), the more detailed information

St. Joseph Center

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Tax ID 95-3874381

obtained during the intake process will be reflected onto the CCP, ensuring they too will contain specific or observable objectives, as required by the County contract.

St. Joseph Center staff would like to thank the Department of Auditor-Controller for their professionalism during the review.

If you have any questions or concerns regarding this corrective action plan, please contact me at (310)396-6468, x330, or, via e-mail at <a href="mailto:nmail

Sincerely,

Nick Maiorino, MFT Intern

Director of Money Management Services